EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, both)
individually and as Legal Guardian of)
SHANE ALLEN LOVELAND, et al.,)
)
Plaintiffs,)
)
v.) Case No. 8:18-cv-00127
)
THE GOODYEAR TIRE & RUBBER)
COMPANY,)
)
Defendant.)

DECLARATION OF EDWARD S. BOTT, JR., IN SUPPORT OF THE GOODYEAR TIRE & RUBBER COMPANY'S SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION IN LIMINE TO EXCLUDE EVIDENCE PURSUANT TO THE SELF CRITICAL ANALYSIS PRIVILEGE

- I, Edward S. Bott, Jr., declare as follows:
- 1. My name is Edward S. Bott, Jr. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts stated herein are true and correct.
- 2. A true and accurate copy of the document identified in The Goodyear Tire & Rubber Company's Supplemental Brief in Support of Motion *in Limine* to Exclude Evidence Pursuant to the Self Critical Analysis Privilege is attached to the Index in Support of The Goodyear Tire & Rubber Company's Supplemental Brief in Support of Motion *in Limine* to Exclude Evidence Pursuant to the Self Critical Analysis Privilege.

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 12th day of February, 2020, in St. Louis, Missouri.

EDWARD S. BOTT, JR.

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